

To: Sugerman, Rebecca[Sugerman.Rebecca@epa.gov]
From: Hillenbrand, John
Sent: Tue 9/9/2014 5:00:20 PM
Subject: RE: Links for requested Documents

From: Salyer, Kathleen
Sent: Monday, September 08, 2014 12:09 PM
To: Dunkelman, Tom; Benson, Craig; Serda, Sophia
Cc: Hillenbrand, John
Subject: RE: Links for requested Documents

Thanks Tom for the quick review. Jared committed to sending a letter to two congressional members on our impression of how DTSC is doing on both the off-site cleanup and permitting. I'm coordinating RCRA/Land and we are shooting for a couple of weeks for the letter. Sophia/John – can you give me your impression by the end of the week? Then I'd like to have a call with DTSC to discuss any concerns we may have, e.g., confirmation sampling. Sound OK?

From: Dunkelman, Tom
Sent: Tuesday, September 02, 2014 10:08 AM
To: Benson, Craig; Salyer, Kathleen; Serda, Sophia
Cc: hillendbrand.john@epa.gov
Subject: RE: Links for requested Documents

I have reviewed the Exide documents, and have only a few comments. In general, I would say their methodology is consistent with that proposed in the EPA Lead Handbook. Of course, the biggest difference is the proposed lead Action Level of 80 mg/kg, which is much more conservative than EPA's current approach. For your convenience, I have included the current language from the Lead Handbook regarding prioritizing response actions, at the end of this email.

Technical Work Plan, Off-Site Properties Exide Technologies, Vernon CA, July 10, 2014.

This document describes cleanup work to be performed at two residential properties, where lead levels exceed the interim action level of 400 mg/kg. In general I found this Work Plan to be a thorough document that includes all of the attributes of a successful cleanup plan. The approach described in the Work Plan is generally consistent with that recommended by the EPA Superfund Lead-Contaminated Residential Sites Handbook, August 2003 EPA; and in fact in some instances goes beyond what EPA would typically require. For example, EPA would likely not require relocation of the residents during cleanup. Also, the entire yard is being excavated to a depth of 18 inches, regardless of whether contamination in excess of the Action Level was present in all parts of the yard. EPA typically would only remediate those decision units which exceed the Action Level. Also, under this Work Plan, the property owner will be provided certificates or coupons to schedule an interior cleaning by a bonded, national cleaning service company experienced in residential home deep cleaning. This seems like a good approach to an often tricky issue.

p. 3-8. 3.13 CONFIRMATION SAMPLING. "Vertical and horizontal limits of excavation are provided on Figures 2 and 3. Therefore, no confirmation sampling will be performed on the bottom of the excavation." **Even though they are excavating beyond the depth where contamination above the action level is thought to be present, I find it unusual that confirmation sampling is not being conducted. EPA typically would require post-excavation confirmation sampling to document that the cleanup Action Levels had been met. If the Action Level is not met at the base of the excavation, EPA would require that some type of marker (snow fence, barrier tape, etc.) be placed at the base of the excavation. The only reason I can see for not performing post excavation confirmation sampling is so that backfilling can occur immediately. Use of a field XRF could help reduce the time frame between excavation and backfilling.**

REVISED ADDENDUM TO THE NOVEMBER 15, 2013, WORK PLAN FOR OFF-SITE SOIL SAMPLING EXIDE TECHNOLOGIES, VERNON, CALIFORNIA, *Prepared for:*

EXIDE TECHNOLOGIES, Vernon, California, March 21, 2014.

This document describes the proposed additional soil sampling to be conducted on the properties previously sampled during the November 2013 sampling event to delineate

the lead concentrations both horizontally and vertically. This document also describes additional sampling on a grid pattern over two areas, each approximately one square mile area in size, situated to the north and to the south of the Exide facility. The sampling to be performed is consistent with that recommended by the EPA Lead Handbook, although I do have a minor suggestion about sieving.

p. 3-4. "Twenty percent (20%) of the samples from the 0 to 1 inch and 1 to 3 inch depth intervals will be designated for sieving by the laboratory using a #60 sieve. The fine fraction will be analyzed for lead in addition to the total fraction." **According to the EPA Lead Handbook, "Samples collected from all depth intervals should be sieved. Samples should not be ground prior to sieving, as this changes the physical structure of the soil and may bias the analytical results. To reduce sampling costs, it may be desirable to develop a correlation between sieved and unsieved data, to eliminate the need to sieve all samples. The correlation can be used to predict sieved results from unsieved samples." If they are not going to sieve all samples, there needs to be a discussion of how the sieved versus non-sieved results will be correlated.**

5.1 PRIORITIZING RESPONSE ACTIONS (Excerpted from the EPA Lead Handbook)

The concentrations that are used to define tiers should not be confused with clean-up numbers, which are based on the PRG determined with the IEUBK model and an analysis that includes the nine criteria listed in the NCP (EPA, 1990b). The 1,200 ppm concentration is not an action level for TCRAs, but is intended to provide an alternative to running the IEUBK model if the project manager believes the site poses an urgent threat (EPA, 1997b, 1997c). Certainly, a TCRA could be justified above or below this concentration depending on the conditions at the site. The tiers, for the purposes of this guidance, are defined below (see also Figure 5-1). (Please note the Agency is considering developing new guidance for removal actions.)

Tier 1 properties have both sensitive populations (children up to 7 years old or pregnant women) and soil concentrations in the surface soils (0–1" depth) at or above 1,200 ppm (EPA, 1997b, 1997c). Also, Tier 1 sites can be identified based upon a demonstration of children's blood lead levels at or above 10 µg/dL. Generally, TCRAs would be taken at Tier 1 properties.

Tier 2 properties have either sensitive populations and soil lead concentrations in

surface soils between 400 ppm and 1,200 ppm, or no sensitive populations and surface soil lead concentrations above 1,200 ppm, but not both. Tier 2 properties can be addressed through TCRAs, or non-time-critical removal actions (NTCRAs), or long-term remedial actions.

Tier 3 properties have surface soil concentrations below 1,200 ppm, but above 400 ppm, and no sensitive populations present. Tier 3 sites would typically be addressed through long-term remedial actions or NTCRAs.

Tier 1 should be the highest priority for immediate action and Tier 3 should be the lowest priority for immediate action. Residential properties can move into a different tier if conditions change (e.g., small children or pregnant women move into a house). A typical residential lead site will contain a combination of properties that fit into different tiers. The project manager should use judgement to determine whether or not to perform a complete cleanup of contaminated residential properties (as defined in Section 1.3).

From: Benson, Craig
Sent: Sunday, August 31, 2014 8:47 PM
To: Dunkelman, Tom
Subject: Fw: Links for requested Documents

From: Ghazi, Rizgar@DTSC <Rizgar.Ghazi@dtsc.ca.gov>
Sent: Saturday, August 30, 2014 12:58:47 AM
To: Salyer, Kathleen
Cc: Lyons, John; Serda, Sophia; Benson, Craig; Sugerman, Rebecca
Subject: FW: Links for requested Documents

Hi Kathleen,

Attached are the key Exide clean up documents.

Rizgar

From: Ruttan, Peter@DTSC
Sent: Friday, August 29, 2014 5:43 PM
To: Ghazi, Rizgar@DTSC
Subject: Links for requested Documents

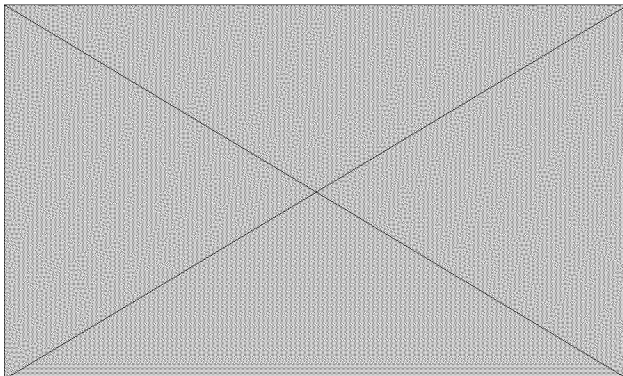
Rizgar,

Here are the electronic documents you requested. They include:

- Interim Measure Work Plan, dated 3/21/2014 (attached)
- Technical Work for Soil Removal – Two Properties, dated July 10, 2014 (attached)
- Addendum Off-Site Soil Sampling Work Plan, dated July 26, 2014 (attached)
- Completed Off-site Dust and Soil Sampling Report, dated 6/26/2014 (non-residential sampling work)
link below

https://www.envirostor.dtsc.ca.gov/public/community_involvement_documents.asp?global_id=80001733&docur

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To send a file larger than 10 MB please use the following link:
http://www.dtsc.ca.gov/database/DTSC_FTP_Requests/index.cfm